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March 17, 2015

Via ECF and Electronic Mail

The Honorable Andrew L. Carter
U.S. District Court Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Room 435
New York, New York

Re: Philadelphia Indemnity Insurance Co. v. SC Academy Holdings, Inc., et al., 1:14-cv-07025-ALC

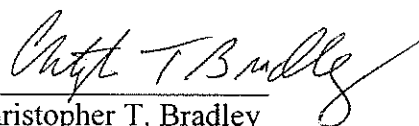
Dear Judge Carter:

We represent Plaintiff, Philadelphia Indemnity Insurance Company (“Philadelphia”) in the above-captioned action.

We are aware of Defendant’s counsel providing updates in this matter. We wish to underscore that Plaintiff, Philadelphia, has taken no affirmative action whatsoever in the New Jersey action. More importantly, none of these minor interim decisions in the New Jersey action involve the application of New Jersey law or address the singular issue before this Court, *i.e.*, the duty to indemnify.

We are acutely aware that the jurisdictional motion before Your Honor involves very important New York public policy issues. We continue to await Your Honor’s decision in this regard.

Respectfully submitted,


Christopher T. Bradley

cc: John W. Schryber, Esq.
Alexis P. Storey, Esq.